

# EXHIBIT 2

**C. WITNESSES:**

The parties have listed below those persons who will be called or who will be available to testify:

**Plaintiff:**

- 1) Mary Lentz: Mary will testify about the wrongful termination and her special damages, as well as the humiliation and mental suffering that she experienced.
- 2) Phil Rumme: Phil is Mary's husband and will testify about the emotional harm that was caused by the wrongful termination.
- 3) Roger Makley: Roger will testify about Cincinnati Insurance Company's referral to the Dayton Ethics Committee and the Prosecutor's Office which resulted in no finding of ethical violations and no basis for charging Mary Lentz with a crime. He will also testify about the emotional harm and suffering.
- 4) Donald Kaiser: Donald will testify about the widespread practice of using copy money for lunches and special events.
- 5) Donald Dessyn: Donald is employed as staff counsel for CIC in the Harrisburg, PA office and will testify about the office practice of using copy money for lunches and about office practices, and structure in general.
- 6) Shelly Bascom: Shelly is still an employee with Cincinnati Insurance Company and will testify about how Mary used the copy money for lunches, and the selective investigation conducted by Al Matheny. Shell will also testify how she was discriminated against compared to other male employees, and, in particular, Mr. Ballato who was found using company equipment to search for pornographic materials and was not disciplined when first reported.
- 7) Paula Ruppert: Paula will testify about the copy money practice, the knowledge of all office staff of the practice, and the selective investigation conducted by Al Matheny.
- 8) Plaintiff reserves the right to call each of Defendants' witnesses, David Balzano, Mark Huller and Al Matheny.
- 9) Plaintiff reserves the right to call additional witnesses as necessary for the purposes of impeachment or rebuttal.

10) Plaintiff may have rebuttal witnesses.